

# EXHIBIT E

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TOPSTEPTRADER, LLC

Plaintiff,

v.

ONEUP TRADER, LLC, and SATTAM  
ALSABAH,

Defendants.

No. 1:17-cv-4412

Judge Harry D. Leinenweber

**Plaintiff TopstepTrader, LLC's First Set of Interrogatories (Nos. 1-5)**

Plaintiff TopstepTrader, LLC requests Defendant Sattam Alsabah answer the following interrogatories under oath on or before December 26, 2017. These interrogatories and the terms used herein shall be construed to require the fullest and most complete disclosure permitted by the Federal Rules of Civil Procedure.

**Definitions and Instructions**

For purposes of these Interrogatories, the following words and phrases shall have the meanings indicated:

1. The term “OneUp” means Defendant OneUp Trader, LLC and each of its predecessors, successors, subsidiaries, divisions, assigns, other names or aliases, and each other entity or person directly or indirectly, wholly or in part, owned or controlled by each, and all present or former partners, principals, employees, officers, agents, legal representatives, consultants or other persons acting or purporting to act on their behalf.

2. The term “Mr. Alsabah” means Defendant Sattam Alsabah and all individuals and OneUp agents or employees acting on Defendant Sattam Alsabah’s behalf.

3. The term “Topstep” means Plaintiff TopstepTrader, LLC and each of its predecessors, successors, subsidiaries, divisions, assigns, other names or aliases, and each other entity or person directly or indirectly, wholly or in part, owned or controlled by each, and all present or former partners, principals, employees, officers, agents, legal representatives, consultants or other persons acting or purporting to act on their behalf.

4. The term “Litigation” means the matter captioned *TopstepTrader, LLC v. OneUp Trader, LLC et al.*, pending in the United States District Court for the Northern District of Illinois, Case No. 17-cv-4412.

5. If Mr. Alsabah identifies documents in response to any interrogatory, Mr. Alsabah must produce those documents pursuant to Rule 33(d) and in line with the instructions provided in Plaintiff TopstepTrader, LLC’s First Set of Requests for Production.

### **Interrogatories**

**Interrogatory No. 1:** Identify all identities used by Mr. Alsabah, including names, usernames, pseudonyms, emails, user identifications, aliases, handles, nicknames, assumed names, and all other credentials, including those used on Topstep’s website.

**Interrogatory No. 2:** Identify and describe the date and circumstances under which Mr. Alsabah first learned of the existence of Topstep or any of its officers, directors, agents, employees, related companies, parent companies, or subsidiaries.

**Interrogatory No. 3:** Identify all persons by name, physical address(es), contact information, and occupation who Mr. Alsabah contacted in Illinois from September 2015 through May 2017.

**Interrogatory No. 4:** Identify all business trips, conferences, seminars, speaking engagements, trade shows, and financial industry-related events attended by Mr. Alsabah in the State of Illinois or that discussed doing business in the State of Illinois.

**Interrogatory No. 5:** Identify any and all internet service providers and internet protocol addresses used by Mr. Alsabah, including those used to access any portion of Topstep's website from September 2015 through May 2017.

Dated: December \_\_\_, 2017

Respectfully submitted,

TOPSTEPTRADER, LLC,

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on December \_\_\_\_\_, 2017, he caused this document to be served upon the following counsel of record through electronic mail delivery.

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By: \_\_\_\_\_